



New York
Los Angeles
Philadelphia

550 S. Hope Street, Suite 1850, Los Angeles, CA 90071
tel 213.234.1750 fax 213.234.1747 leaderberkon.com

March 9, 2022

Hon. Margo K. Brodie
United State District Judge for the Eastern
District of New York
225 Cadman Plaza East
Brooklyn, New York 11202

Re: Julie Goggin, et al. v. JetBlue Airways Corporation

Case No. 20-cv-6188 (MKB)

Dear Judge Brodie:

We represent defendant JetBlue Airways Corporation in the captioned matter. On February 11, 2022, we submitted our letter, pursuant to Rule 3.A of the Court's Individual Practices and Rules requesting a pre-motion conference for a motion for summary judgment that JetBlue intends to file. When we submitted our request, we also asked the Court to provide plaintiff's counsel with an additional thirty (30) days in which to respond. The basis for that request was the delay, through no fault of plaintiff or her counsel, in obtaining the depositions of several JetBlue witnesses whose testimony is relevant to plaintiff's opposition. On February 13, 2022, the Court granted that request and ordered plaintiff to respond by March 15, 2022.

We are pleased to inform the Court that plaintiff has since taken the depositions of three of the JetBlue witnesses. However, the depositions of three additional witnesses are still necessary. In addition, JetBlue expects to produce within the next ten days additional documents regarding the flight in question and its procedures and training concerning issues involving racial discrimination. In light of this remaining discovery, the parties respectfully request that the Court grant a further extension for plaintiff's response to JetBlue's request for a pre-motion conference by an additional thirty (30) days.

Respectfully submitted,

/s/Arthur I. Willner

ARTHUR I. WILLNER